

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	CASE NO. 4:22CR3077
)	
Plaintiff,)	
)	
v.)	RESPONSE TO
)	GOVERNMENT'S MOTION
)	FOR A PROTECTIVE ORDER
NEIL SURESH CHANDRAN,)	
)	
Defendant.)	

The Defendant, Neil Suresh Chandran, hereby opposes the government's motion for protective order for the following reasons:

1. The government has not shown good cause for the issuance of a protective order in this case under Fed. R. Crim. P. 16(d).

2. The government's motion and the proposed protective order is vague with respect to the permissible dissemination of the discovery provided by the government. The government's motion does not show how a redaction of information under Fed. R. Crim P. 49.1 does not accomplish the goal of protecting individual's privacy rights.

3. Defense counsel is concerned that the scope of the proposed protective order is too broad and would prohibit defense counsel's review of the information in the discovery with the Defendant, experts retained by defense counsel and other individuals working on behalf of Defendant's counsel. In this respect, the scope of the protective order infringes on the Defendant's right to counsel under the Sixth Amendment.

4. Defense counsel has received discovery from the government for over 40 years without any claim that defense counsel improperly "disseminated" materials

received from the government. There is no reason to believe the discovery received from the government will not be treated appropriately by defense counsel.

5. The proposed protective order does not place any restrictions on the government's use of the discovery information. Any protective order in this case should also apply to the government and prohibit it from disclosing the discovery directly or indirectly to any person or entity other than persons employed to assist the prosecution of the case, person who are interviewed as potential witnesses, counsel for potential witness, and other persons to whom the Court may authorize disclosure.

WHEREFORE, the Defendant respectfully requests the Court deny the government's motion for protective order.

NEIL SURESH CHANDRAN, Defendant,

/s/ David R. Stickman

DAVID R. STICKMAN

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